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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RON SCHRECKENGOST, an individual, and
ELIZABETH WALSH, an individual,

Plaintiff,

vs.

THE STATE OF NEVADA *ex rel.* the
NEVADA DEPARTMENT OF
CORRECTIONS; and PERRY RUSSELL, an
individual.

Defendants.

CASE NO: 3:19-cv-00659-MMD-CLB

STIPULATION, REQUEST, AND
[PROPOSED] ORDER
ENLARGING TIME FOR
PLAINTIFFS TO OPPOSE DEFENDANTS'
TWO MOTIONS TO DISMISS
(ECF 069 and ECF 070)

(FIRST REQUEST)

The parties to this action, by and through their undersigned counsel of record hereby stipulate that Plaintiffs may have a three (3)-week extension of time to file their opposition briefs to Defendants' two motions to dismiss (ECF 069 and ECF 070), through and including Friday, Nov. 20, 2020. Pursuant to this stipulation, the parties hereby request that the Court grant this enlargement of time. This is the first request for such an extension. The original deadline to file these two opposition briefs is Friday, October 30, 2020, which deadline has not yet run. The reasons that additional time is requested here is because Plaintiff's Counsel has been and continues to be quite busy with many pressing matters in other cases, including: the filing of a federal-court discrimination complaint during the week of October 26, 2020; preparation for, and attendance of, two ENE conferences in federal court, scheduled for the week of October 26, 2020, the submission of two rebuttal statements to the EEOC for two discrimination claims in the week of November 2 and 9, 2020, and the filing of a state-

1 court discrimination complaint during the week of November 9, 2020. As well, Plaintiff must oppose
2 two motions to dismiss here, rather than one, which will take additional time to accomplish. This
3 stipulation and request are not made for any dilatory or improper purpose.

4 Dated this 26th Day of October.

THE GEDDES LAW FIRM, P.C.



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Walsh*

12 Dated this 26th Day of October .

AARON D. FORD
Nevada Attorney General

Electronic Signature Authorized

/s/ Scott H. Husbands

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Nevada ex rel. its Department of
Corrections and
Perry Russell*

ORDER

25 Dated: October 26, 2020

IT IS SO ORDERED



UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Geddes Law Firm, P.C., and that on **October 26, 2020**, I caused to be served a copy of the foregoing *Stipulation, Request, and [Proposed] Order Enlarging Time for Plaintiffs to Oppose Defendants' Two Motions to Dismiss (ECF 069 and ECF 070) (First Request)*, by filing the same with the Court's electronic filing system (PACER), addressed to the following:

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